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January 12, 2006

VIA OVERNIGHT DELIVERY AND ECFS

Ms. Nazifa Sawez
Federal Communications Commission
Room 2-A726
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Multimedia Holdings Corporation
KUSA-DT, Denver, CO (Facility ID 23074)
**REPLY TO ECHOSTAR OBJECTION OF KUSA's
339(a)(2)(D)(vii) WAIVER REQUEST
In the Matter of Waiver of Digital Testing Pursuant to the Satellite
Home Viewer Extension and Reauthorization Act of 2004
MB Docket No. 05-317**

Dear Ms. Sawez:

Multimedia Holdings Corporation ("MHC"), a wholly-owned subsidiary of Gannett Co., Inc., licensee of broadcast television station KUSA-TV and permittee of KUSA-DT, Denver, Colorado, hereby replies to the Opposition of EchoStar Satellite L.L.C. ("EchoStar") filed with the FCC on December 30, 2005 ("Opposition") regarding the above-referenced matter.

In the Opposition, EchoStar opposes KUSA's Request for Waiver of Satellite Subscriber Digital Signal Testing filed with the FCC on November 28, 2005 ("Waiver Request"). However, EchoStar clearly misrepresents KUSA's position presented in the Waiver Request for the following reasons.

1. *Echostar acknowledges KUSA's current use, by means of FCC Special Temporary Authorization, of a temporary reduced power DTV facility, but argues that Gannett "fails to explain why that facility could not be converted to a full-power facility".* In fact, in KUSA's Interference Resolution Agreement and supporting documents filed with the FCC on August 12, 2005 in connection its DTV first-round channel election conflict resolution (FCC File No. BFRCT-20050809AAF), KUSA explains that this temporary facility "cannot be upgraded to high power for a number of technical (RF radiation) and zoning (city code) issues".

The Commission is aware of extensive and ongoing zoning issues at Lookout Mountain, Colorado, which continue to prevent certain Denver television broadcasters, including KUSA (collectively, the "Lake Cedar Group"), from constructing and operating permanent DTV facilities. Because of these issues, KUSA cannot operate full, maximized DTV facilities at such temporary location due to potential interference issues.

2. ***EchoStar argues that Gannett "does not present any indication that it has considered any alternative permanent site for KUSA's full-power digital antenna" and that it "has not investigated other sites as alternative locations, or, if it has, why those locations were unsuitable."*** If EchoStar was as familiar as it says it is with the "zoning issues and related litigation hurdles faced in connection with Lookout Mountain facilities" (Opposition at P. 19), it would know that the Commission has received a detailed study demonstrating the lack of alternative sites. On August 23, 1999, KUSA and other Lake Cedar Group television stations filed an Opposition to the Petition for Reconsideration with the FCC ("Petition") in opposition to a petition filed by the Advisory Council on Historic Preservation (ET Docket No. 99-267). The Petition provides an in-depth discussion of the lack of alternative sites for locating these stations' DTV facilities, and cites an extensive study submitted by consulting engineers John F.X. Browne & Associates in which several alternative sites were analyzed, and which concluded that Lookout Mountain was the only site that could adequately support these stations' DTV facilities in full compliance with FCC rules and other applicable laws, including RF radiation.

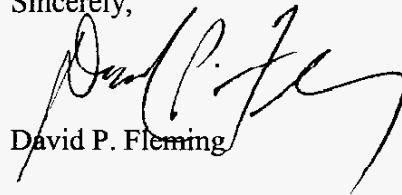
3. ***EchoStar argues that "Just because there would be cost savings from collocating multiple stations on a single tower does not excuse Gannett from having to explore alternative sites", and that "under no circumstances may a waiver be based on financial exigency"***. Nowhere in the Waiver Request does Gannett present any arguments based on financial or cost considerations. Gannett did state, however, that KUSA-DT's viewers are currently unable to receive a full power digital signal of KUSA-DT. DBS signal strength tests performed in the Denver market would confirm this situation. On the basis of those tests, viewers could establish eligibility to receive distant digital NBC network signals, resulting in a loss to KUSA of potentially thousands of Denver viewers to whom KUSA provides local news, public affairs and local emergency information.

Accordingly, Multimedia respectfully requests that the Commission deny EchoStar's Opposition and grant its request that the FCC prohibit satellite carriers from conducting digital signal tests, pursuant to viewer requests, in the Denver, Colorado DMA. This reply is filed concurrently through the FCC's ECFS electronic filing system.

Neither MHC nor any party to this request, including Gannett, is subject to denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853a.

If further information is required, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "David P. Fleming", is written over the printed name. The signature is stylized with a large, sweeping initial 'D' and a long, horizontal stroke at the end.

David P. Fleming

cc: David K. Moskowitz, Esq., EchoStar Satellite, L.L.C.

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